



# STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

Received

MAY 3 1999

Common Carrier Bureau  
Network Section Chief  
Office of the Chief

April 30, 1999

Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

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MAY 3 1999

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Re: File No. NSD-L-99-27, Maine Public Utilities Commission Petition for  
Additional Authority to Implement Number Conservation Measures

Dear Ms. Salas:

CC DOCKET 96-98

Enclosed please find one original and five copies of the Connecticut Department  
of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

*Louise E. Rickard*

Louise Rickard  
Acting Executive Secretary

Enc.

cc: Al McCloud

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

Maine Public Utilities Commission's Petition for  
Additional Authority to Implement Number  
Conservation Methods

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File No.  
NSD-L-99-27

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FCC MAIL ROOM

COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the Maine Public Utilities Commission's (MPUC) Petition for Additional Delegated Authority to Implement Number Conservation Measures (Petition). MPUC requests the Commission delegate authority to: (1) establish number assignment and utilization standards; (2) order interim unassigned number porting; and (3) order thousand-block pooling. Authority to implement these number conservation measures would permit MPUC to: a) establish fill rates that must be met before a carrier may acquire an additional code in a rate center where it already has a code; b) establish needs-based criteria for the acquisition of codes such as (i) requiring a carrier to make a showing that it has (or will have within 6 months) the necessary facilities to serve a particular rate center before a code is assigned and (ii) requiring carriers to utilize other code conservation measures to provide service in rate centers where the carrier will serve minimal numbers of customers

in that rate center. Delegation of authority to implement these conservation measures will also permit MPUC to: (3) reclaim codes which have been acquired in violation of the North American Number Plan Administrator (NANPA) Guidelines (Guidelines) and any other applicable rules or regulations; (4) reclaim codes which are being used to provide service in violation of state law; (5) reclaim test codes and codes which have not been put in service within the time provided by the Guidelines and other protocols or policies established by the MPUC; (6) reclaim codes acquired by carriers certifying that they would be facilities-based carriers but who have failed to establish facilities within the appropriate time frame; (7) establish mandatory number utilization reporting requirements; and (8) establish procedures to audit carrier utilization reports.

## II. Discussion

On March 17, 1999, MPUC petitioned the Commission requesting that the Commission delegate MPUC the authority to: (1) establish number assignment and utilization standards; (2) order interim unassigned number porting; and (3) order thousand-block pooling. CTDPUUC supports the Petition and recommends that it be adopted by the Commission because its adoption should increase number utilization efficiency. The Petition should be approved because MPUC is in a better position to determine what is in the best interest of the State of Maine.

MPUC has requested Commission authority to implement several area code conservation measures that it believes will minimize consumer confusion and expense associated with the introduction of new area codes. Approval of the Petition will provide MPUC with the ability to delay or implement new area

codes, as necessary. In support of its Petition, MPUC has provided overwhelming evidence demonstrating the inefficient use of NXX codes as indicated by its finding that there are currently more than 5.7 million unused numbers within the 207 area code; more than 3 million of the 5.7 unused numbers are within central office codes that have already been assigned; the utilization rate for numbers within assigned central office codes in Maine is approximately 40%; and Maine has more than 220 rate centers, many of which have fewer than a thousand lines (one of which has as few as 20). Petition, pp. 2 and 6.

MPUC has requested Commission approval to establish number assignment, number utilization standards (e.g., needs-based criteria and the ability to audit carrier utilization reports). CTDPUc believes a requirement that carriers maximize NXX fill rates and that they also demonstrate a need for such numbers in a particular rate center before seeking additional NXXs should be adopted as a means of slowing down the unnecessary assignment of numbers. Similarly, requiring carriers to present a more detailed demonstration through the auditing of utilization reports is an excellent starting point in ensuring that numbers are being assigned in an efficient manner. These measures alone should begin to minimize the occurrence of code holders possessing excess number reserves.

Additionally, providing MPUC with the ability to reclaim unused codes or those codes that have been acquired on an unlawful basis should also add to the code inventory, thus delaying the introduction of new NPAs. CTDPUc also

believes that MPUC should be provided with the ability to order interim unassigned number porting. Delegation of such authority would allow MPUC to provide for a more efficient assignment of telephone numbers and reduce the confusion often associated with the introduction of new NXXs in Maine.

Lastly, CTDPUUC notes that MPUC's request for authority to implement mandatory thousand block number pooling is similar to that delegated to Illinois. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks) is clearly the underlying factor creating the NPA shortage today. One thousand block number pooling would provide for a more efficient use of telephone numbers and minimize a wasteful allocation of these limited resources. MPUC should be afforded the same opportunity as was provided in Illinois.

### III. Conclusion

MPUC has offered the Commission several area code conservation measures, that if adopted as proposed, would provide MPUC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide MPUC with the flexibility to implement conservation measures and afford MPUC the ability to impose stricter

requirements on those seeking codes requiring a more efficient use of the codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC  
UTILITY CONTROL

Donald W. Downes  
Chairman

Glenn Arthur  
Vice-Chairman

Jack R. Goldberg  
Commissioner

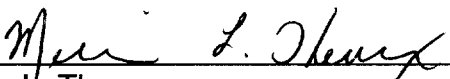
John W. Betkoski, III  
Commissioner

Linda Kelly Arnold  
Commissioner

April 30, 1999

Connecticut Department of  
Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

**CERTIFICATION**

  
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Miriam L. Theroux  
Commissioner of the Superior Court